

JAN - 8 2024

U. S. DISTRICT COURT
EASTERN DISTRICT OF MO
CAPE GIRARDEAU

IN THE UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF EASTERN MISSOURI

(Rush Hudson Limbaugh Sr. U.S. Courthouse, 555 Independence Street, Cape Girardeau, MO 63703)

Ronald Satish Emrit,)
Plaintiff (Pro Se))
v.) C. A. No.:
The Grammys Awards on CBS d/b/a)
The Recording Academy/National)
Academy of Recording Arts and)
Sciences (NARAS),)
Defendant)
)
)

COMPLAINT

COMES NOW, the plaintiff Ronald Satish Emrit, who is bringing forth this complaint against the sole defendant The Grammys on CBS d/b/a The Recording Academy/NARAS seeking \$45 million dollars in punitive, compensatory, and treble damages. In bringing forth this complaint, the plaintiff states, avers, and alleges the following

I.) NATURE OF THE CASE

- 1.) Pursuant to Rule 201 of Federal Rules of Evidence (FRE), the court should take judicial notice that Judge Pamela Chen of Eastern New York (EDNY) transferred a case against The Grammy Awards from Eastern New York to Los Angeles where the case in Los Angeles was presided over by Judge

Percy Anderson who also presided over the plaintiff's litigation against Universal Music Group (UMG), Island Def Jam Group, Estate of Shakir Stewart, and Mr. William ROberts p/k/a "Rick Ross" from 2019 and 2020.

- 2.) In addition, the court should also take judicial notice that a separate case was transferred from New Orleans, Louisiana to Los Angeles by Magistrate Judge Janis Van Meerveld in Los Angeles after the plaintiff filed a response to the Order to Show Cause (OSC) issued by Magistrate Judge Janis Van Meerveld in New Orleans.
- 3.) Furthermore, the court should take judicial notice that a third case might have been transferred to Los Angeles after Magistrate Judge Shiva Hodges issued a Report and Recommendation (R&R) in South Carolina suggesting that the case should be transferred from South Carolina to Los Angeles whereby Judge Donald Coggins might not have adopted the Report and Recommendation issued by the Magistrate Judge.
- 4.) Nevertheless, the defendant Grammy Awards is having significant public relations problems given the legal problems of their recording artists and executives like Harvey Weinstein.

II.) PARTIES TO THIS LITIGATION

- 5.) The plaintiff is an indigent, disabled, and unemployed resident of the state of Florida and Maryland (the plaintiff spends half of the year in Florida and the other half in Maryland traveling with his father who is a widely-recognized musician in several states on the Atlantic coast). His current mailing address is 5108 Cornelias Prospect Drive, Bowie, Maryland 20720. His cell phone number is currently (703)936-3043 and his primary email address is einsteinrockstar2@outlook.com.
- 6.) The defendant is The Recording Academy d/b/a The Grammy Awards which has a principal place of business (ppb) and/or nerve center off of Olympic Boulevard or Pico Boulevard in Santa Monica and has a phone number of (310)392-3777 in their Los Angeles office.

III.) JURISDICTION AND VENUE

7.) According to Federal Rules of Civil Procedure 8(a)(1), Plaintiff is required to provide "a short and plain statement of the grounds for the court's jurisdiction, unless the court already has jurisdiction and the claim needs no new jurisdictional support;"

8.) Because the court does not already have personal or subject matter jurisdiction over this issue, it is necessary to engage in a brief discussion of the court's jurisdiction so that the defendants can not move to dismiss this case based on procedural grounds involving a lack of proper jurisdiction.

9.) Pursuant to 28 U.S.C.A. Section 1332, the U.S. District Court for the District of Washington State (as an Article III court) has jurisdiction over this matter because there is complete diversity of jurisdiction between the Plaintiff and the five defendants given that the plaintiff lives in Sarasota, Florida and no longer in Fort Worth, Texas.

10.) As an Article III court, the U.S. District Court for the District of Washington State also has subject matter jurisdiction over the present case at bar because this proceeding involves a discussion of Title VII of the Civil Rights Act of 1964, Americans with Disabilities Act of 1990, Equal Protection Clause, Due Process Clause, Fourth Amendment, and Privileges and Immunities Clause.

11.) Therefore, a federal question is presented by the implication of the black-letter law of the aforementioned federal statutes in addition to the discussion of Constitutional Law provisions.

12.) Venue in this jurisdiction is also proper pursuant to 28 U.S.C.A. Sections 1391 and 1400.

13.) Because the amount in controversy does exceed \$75,000 (i.e. \$45,000,000 is more than \$75,000), this court has jurisdiction on the grounds of diversity and a federal question presented.

IV.) STATEMENT OF FACTS

14.) Robert Accatino of the Los Angeles chapter of the Grammy Awards ended the plaintiff's membership in the Grammys in 2010.

15.) The plaintiff recently contacted the Grammys expressing his desire to re-join

the Grammy Awards and to take his Ukrainian fiance to the Grammy Awards.

16.) Nevertheless, the plaintiff was a non-voting Grammys member between the years of 2005 and 2010 and was in the Washington, DC chapter between 2005 and 2009 and supposedly joined the Florida chapter in 2009 before his membership was prematurely terminated in 2010.

17.) The plaintiff attended the Grammy Awards in 2006 at The Staples Center at 1111 Figueroa Avenue with his publicist Tamille Hawkins who was a member of the Washington, DC chapter of The Grammys and Philadelphia and managed a jazz band by the name of “Pieces of a Dream.”

18.) The plaintiff attended the Grammy Awards in 2007 with Gloria Nauden who was an employee of Black Entertainment Television (BET) and worked at Love The Club/Dream night club off of Okie Street in NE Washington, DC for Marc Barnes who also arranged the Lebron James NBA all-star after-party at Bellagio HOrtel in 2007 which the plaintiff helped drive a UHaul truck from Los Angeles to Las Vegas for this event.

19.) The plaintiff also attended The Grammy Awards in 2010 with Ashley Boxley or Ashley “Honey Azul” Williams of Palmyra, Virginia who was in the music video for the plaintiff’s song “Lookin’ for My Dimepiece” filmed by Tee Platinum of Platinum Plus Productions of Atlanta, Georgia who has worked with TI and Waka Flocka and also filmed the plaintiff’s music video for “Brenda (Having My Baby)” which featured Babyface’s guitar player “Randy” on the song and featured the model Deena Minnoia if Tampa, Florida from Model Mayhem/Craigslist in a music video filmed at Columbia Mall in Columbia, Maryland and Owings Mills, Maryland.

20.) The plaintiff also attended the Latin Grammy Awards in 2006 with his friend Damon Ford at Madison Square Garden in which the plaintiff and Damon Ford both traveled to Santiago de Cuba back in 1999 and visited Rachel Barreiro Garcia, i.e. a medical student from Las Tunas, Cuba, and her friend Marena Linares who is now a dental assistant from Tenerife in the Canary Islands.

21.) In the year 2008, the plaintiff mailed a copy of his CD “Unleash the Beast” to the Grammy Awards on Olympic or Pico Boulevard to be entered into

consideration for a Grammy Award in which the plaintiff won an American Idol Underground contest in 2006 for his song “La Reina Cubana” which won Honorable Mention in the John Lennon Songwriting Competition (JLSC) through an “electronic press kit” d/b/a Sonicbids, Inc. of Boston, MA. Accordingly, the plaintiff’s song “All The Fine Ladies” or “La Reina Cubana” won a Billboard R&B/hip hop contest in 2007 through Sonicbids in which the plaintiff communicated with Dave Moser of The Hollywood Reporter, Lisa DiAntonio of Billboard Magazine, and Charles Perez of Nielsen Soundscan.

22.) In 2005, the plaintiff met Gloria Estefan, Neil Portnow, and Congressman Steny Hoyer (D- Maryland) at Grammys on The Hill event at Willard Intercontinental Hotel in Washington, D.C.; in 2006, the plaintiff met Kelly Clarkson at Willard Hotel off of Pennsylvania Avenue at an event honoring Senator Diane Feinstein (D- California) and in 2005, the plaintiff met Mariah Carey at a Grammys event at Gotham Hall off of Broadway in New York, New York in which there was a picture taken by Faith Morgan from Azerbaijan (perhaps involving Rule 901 of Federal Rules of Evidence involving authentication).

23.) The plaintiff also explained to the Grammys offices that he was a 2016 and 2020 presidential candidate with the number from the Federal Election Commission (FEC) as P60005535 and the committee number for the Political Action Committee (PAC) or Separate Segregated Fund (SSF) as C00569897.

24.) Accordingly, the number for Maria Cherniavska on Whatsapp is +380994339671

25.) I am letting your office know that I am going to be filing a \$45 million lawsuit against the Grammy Awards/Recording Academy in Nashville, Tennessee and Mississippi and Columbia, South Carolina and New Orleans, Louisiana strategically in those 4 (four) jurisdictions because I have received favorable rulings there from Judge Aleta Trauger, Judge Carl Barbier, Judge Donna Phillips Currault, Magistrate Judge Shiva Hodges, and Judge Roy Percy who presides over my litigation against University of Miami.

26.) Just like the Denny's lawsuits, my \$45 million lawsuit against the Grammys alleges racial discrimination and that I am being discriminated against because I am a black man or African-American and that if I were a white man then my Grammys membership would have been reinstated. More specifically, there is someone named Robert Accatino who ended my Grammys membership and my lawsuit against the Grammys will mention that Robert Accatino is a racist Latino man.

27.) The recording artist known as The Weeknd also believes that the Grammys are racist. The Grammys are not popular anymore and have public relations problems because they give awards to Kanye West who is like Adolf Hitler and racist against Jews (anti-semitic).

28.) The Grammys probably also honored Robert Kelly (R. Kelly) who is a very sick man and Harvey Weinstein is also a very sick man in addition to Kevin Spacey. Russell Simmons is a fugitive in Bali, Indonesia and Afrika Bambaata has been accused by Ronald "Bee Sting" also of being on the level of Harvey Weinstein and Kevin Spacey.

29.) The Grammys are not "above the law" and the Grammys are not "above Civil Rights lawsuits." I am letting you know that yesterday on August 3rd, 2023, I contacted all 12 chapters of the Grammys from my cellphone/Android to inform them that I am going to be filing lawsuits against the Grammys in Tennessee, Mississippi, South Carolina, and Louisiana and they could be docketed as early as next week depending on how long that takes me to draft up a complaint.

30.) Those Grammys numbers are the following: (202)662-1341 in Beltsville, Maryland and (215)985-5411 in Philadelphia and (212)245-5440 in New York and (305)672-4060 in Miami and (512)328-7997 in Texas and (615)327-8030 in Nashville, Tennessee and (901)525-1340 in Memphis and (312)786-1121 in Chicago and (206)834-1000 in Seattle and (415)749-0779 in San Francisco.

31.) Because Judge Aleta Trauger authorized service of process on Sony Music Entertainment through U.S. Marshals and Form USM-285, it is quite possible that a federal judge could authorize service of process on Grammys office on Olympic or Pico Boulevard through the United States Marshals Service (USMS).

32.) The number for the Grammys in Los Angeles is (310)392-3777 and as my own attorney pro se and in forma pauperis, I have the right to inform the Grammys that they are going to be a federal defendant in four lawsuits nationwide seeking punitive, compensatory, and treble damages regardless of whether or not the cases are dismissed before service of process.

33.) Lawyers and consumers contact businesses all the time to inform them of pending or upcoming litigation and African-Americans file civil lawsuits all the time and so the Grammys are not above litigation from former members, employees, or consumers who have to inform the Grammys of the litigation.

34.) The work ID number from ASCAP for Lady Brazil is **883637841**. The ISWC code for Lady Brazil from ASCAP is **T9112600369**.

35.) The IPI number for the songwriter of Lady Brazil from ASCAP is **484616724**. The IPI number for the publisher (Tunecore) of Lady Brazil from ASCAP is **641638348**.

36.) The ISRC code for Lady Brazil from Sound Exchange (generated by Ditto Music of England) is **USA2P1313567** with a time of **4:31**. The copyright number issued by the Library of Congress for Lady Brazil is **PAu003483176** / with an issue date of 2009-01-30.

37.) The case number for ***Ronald Emrit v. ReverbNation*** in North Carolina is **1:2014cv01014** filed on **December 4, 2014** with Judge Patrick Auld.

38.) The song “Lady Brazil” was recorded at the Garrett Music Academy in Owings, Maryland (Calvert County) with D-Rail and the music video was in

Quincy, Massachusetts involving Santiago Semino of Argentina, Pamela Masucci of The Beauty Within Models of Westerly, Rhode Island and their make-up artist and hair stylist.

V.) COUNT ONE: VIOLATION OF THE CIVIL RIGHTS ACT OF 1964

39.) Just like the Denny's lawsuits, the Grammys have to pay attention to Civil Rights of African-Americans who are part of a suspect classification of discrete and insular minorities which have experienced invidious discrimination within the context of American jurisprudence.

40.) The recording artist professionally known as the "Weeknd" also expressed the fact that he believes that he has been discriminated against by the Grammys/NARAS based off of his status as an African-American.

41.) While the plaintiff is nowhere near as popular as The Weekend, the plaintiff is still an independent recording artist and former Grammys member who believes that he also has been discriminated against on the basis of race and ethnicity no different from The Weeknd.

42.) Therefore, the plaintiff believes that this lawsuit should be a class action lawsuit pursuant to Rule 23 of Federal Rules of Civil Procedure (FRCP) substantially similar to the litigation brought by Brian Flores of the Miami Dolphins in the National Football League (NFL) regarding head coach positions in the NFL.

43.) Pursuant to Rule 201 of Federal Rules of Evidence (FRE), the court should take judicial notice that the plaintiff also had litigation in 2019 and 2020 against The National Football League (NFL), Daniel Snyder, and Washington Redskins in which the Washington Redskins are now known as having a different mascot as "Washington Commanders."

44.) Nevertheless, because the plaintiff is now trying to get married to Maria Cherniavskaya of Kharkiv, Ukraine, the plaintiff argues that it is necessary to provide her number on Whatsapp, i.e. +380994339671.

45.) Pursuant to Rule 201 of Federal Rules of Evidence (FRE), the court should take judicial notice that this number on Whatsapp has been uploaded in PACER or CM/ECF on Page 5 of an In Forma Pauperis Application/Affidavit submitted according to 28 U.S.C. Section 1915. Once again, that number on Whatsapp is +380994339671.

VI.) PRAYER FOR RELIEF

WHEREFORE, the plaintiff is seeking the equitable remedy of an injunction requesting that the court award the plaintiff \$45 million against the defendant Grammy Awards on CBS d/b/a The Recording Academy/NARAS. In asserting this “prayer for relief,” the plaintiff states, avers, and alleges the following:

- A.) This proposed judgment in the amount of \$45,000,000 would be considered to be punitive, compensatory, and treble damages for the violation of The Civil Rights Act of 1964.
- B.) This proposed judgment in the amount of \$45,000,000 would also be considered to be expectation, reliance, restitution, incidental, consequential, and/or liquidated damages as the material breach of contract since the plaintiff used to be in “privity of contract” with the sole defendant The Grammy Awards on CBS d/b/a The Recording Academy/NARAS
- C.) Furthermore, the plaintiff is seeking the equitable remedy of an injunction requiring and/or mandating that the sole defendant reinstate the plaintiff’s Grammys membership as specific performance according to contract law.

D.)

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Ronald Satish Emrit". The signature is fluid and cursive.

Ronald Satish Emrit

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